

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MEDITERRANEAN SHIPPING CO. S.A. and  
MEDITERRANEAN SHIPPING CO. (USA)  
INC.,

Plaintiff(s),

-against-

ALL AMERICAN PRODUCE CORP.,

Defendant(s).

07-cv-11110 (Baer)

NOTICE OF MOTION


PLEASE TAKE NOTICE that Plaintiffs, MEDITERRANEAN SHIPPING COMPANY S.A. and MEDITERRANEAN SHIPPING CO. (USA) INC., by their attorneys, MAHONEY & KEANE LLP, will move this Court before the Honorable Harold Baer, Jr., at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY, for an order, pursuant to Rule 55 of the Federal Rules of Civil Procedure, entering a default judgment in favor of Plaintiffs and against Defendant for failing to appear and otherwise defend this action, and for such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, NY

July 18, 2008

MAHONEY & KEANE, LLP  
Attorneys for Plaintiff(s)  
MEDITERRANEAN SHIPPING CO. S.A. and  
MEDITERRANEAN SHIPPING CO. (USA) INC.

By:



Jorge A. Rodriguez (JR 2162)  
111 Broadway, Tenth Floor  
New York, New York 10006  
Tel (212) 385-1422  
Fax (212) 385-1605  
Our File No. 12/3507/B/07/12

SERVICE LIST

ALL AMERICAN PRODUCE CORP.  
426 S.W. 8<sup>th</sup> Street, #8  
Miami, FL 33130